

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DISTRICT**

| | | |
|---------------------------------|---|--|
| SUBHASH MANNAVA, an individual, |) | |
| |) | |
| Plaintiff, |) | Case No.: 21-cv-1303 |
| |) | |
| v. |) | Hon. Matthew F. Kennelly |
| |) | |
| TD AMERITRADE, INC., WEBULL |) | Removed from the Circuit Court of the |
| FINANCIAL, LLC, APEX CLEARING |) | Twelfth Judicial Circuit, Will County, |
| CORPORATION, ROBINHOOD |) | Illinois |
| FINANCIAL, LLC, and BANK OF |) | |
| AMERICA, |) | State Court Case No.: 2021-CH-75 |
| Defendants. |) | |

MOTION FOR EXTENSION OF TIME

NOW COMES, the Plaintiff, Subhash Mannava (“Plaintiff”), by and through his attorneys, Cart & Guth Law, LLC and Donner and Company Law Offices, LLC, and moves this honorable Court for an extension of time to complete disclosures pursuant to F. R. Civ. Pro. 26(a)(1) on the basis that the Parties have potentially settled all claims between Plaintiff and the remaining Defendant, Bank of America (“BoA”) pending final revisions between the parties through a formalized written settlement agreement. In support of this motion, Plaintiff states as follows:

1. This action was originally filed with the Twelfth Judicial Circuit, Will County, Illinois (the “State Court Matter”).
2. On March 25, 2021, Plaintiff filed his *Verified First Amended Complaint* (the “Complaint”) adding Webull, BoA, Robinhood, and Apex to this litigation as Defendants.
3. All other defendants, other than BoA, have been voluntarily dismissed by Plaintiff without prejudice.
4. As of the date of the filing of this instant motion, Plaintiff and BoA are finalizing

settlement terms through a formal written settlement agreement, which the parties expect to have signed in the near future.

5. The extension sought herein is not requested for purposes of delay or harassment. The parties simply need additional time to finalize terms of settlement, which will forego any need to conduct discovery in this matter.

6. Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure provides that the Court may grant an extension of time at its discretion. Fed. R. Civ. P. 6(b)(1)(A).

WHEREFORE, Plaintiff respectfully requests that this Honorable Court:

- A. Enter an Order granting an extension of time to complete Rule 26(a)(1) disclosures;
- B. Set this matter for status on settlement to the previously scheduled status hearing set for October 13, 2021 at 9:15; and
- C. Provide Plaintiff with such other and further relief as this Honorable Court deems appropriate and just.

Respectfully submitted,

Subhash Mannava, Plaintiff

By: /s/ Oran D. Cart
One of His Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney on oath certifies that on September 14, 2021, prior to 6:00 p.m. CST, he caused a copy of the above motion to be served upon all counsel or parties of record in the above-captioned matter via CM/ECF electronic delivery.

/s/ Oran D. Cart

Oran D. Cart

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